

EXHIBIT B

**Certification of Thomas W. Ladd
In Support of Application for Retention of
McCarter & English, LLP, Effective as of April 4, 2023**

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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PROPOSED ATTORNEYS FOR DEBTOR

McCARTER & ENGLISH LLP

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*PROPOSED SPECIAL COUNSEL FOR
DEBTOR*

In re:

LTL MANAGEMENT LLC,¹

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

**CERTIFICATION OF THOMAS W. LADD
IN SUPPORT OF APPLICATION FOR RETENTION OF
MCCARTER & ENGLISH, LLP, EFFECTIVE AS OF APRIL 4, 2023**

I, Thomas W. Ladd, being of full age, certify as follows:

1. McCarter & English, LLP (“McCarter”) is seeking authorization to be retained as special insurance counsel and New Jersey talc mesothelioma counsel to LTL Management LLC (the “Debtor”) in the Chapter 11 Case and I make this certification in support of the

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

Application for Retention of McCarter & English, LLP, Effective as of April 4, 2023 filed by the Debtor (the “Application”).²

2. I am a partner at the firm of McCarter & English, LLP in the Insurance Recovery, Litigation & Counseling practice group and have more than thirty years of experience practicing in the areas of insurance coverage, product liability, and general litigation. I am a member in good standing of the Bars of the State of New Jersey and Ohio and am admitted to practice before the United States District Court for the Districts of New Jersey and Ohio, as well as the United States Court of Appeals for the Third, Fifth, and Sixth Circuits.

3. I am duly authorized to make this certification on behalf of McCarter.

4. The proposed arrangement for compensation, including hourly rates, if applicable, is as follows:

Pursuant to the terms of the Engagement Letter and subject to the Court’s approval of this Application, McCarter intends to: (a) charge for its legal services on an hourly basis in accordance with the ordinary and customary hourly rates in effect on the date services are rendered; and (b) seek reimbursement of actual and necessary out-of-pocket expenses.

In addition, to the extent that McCarter represents both the Debtor and J&J in a matter, McCarter will allocate 50% of its fees and expenses incurred in such joint representation to the Debtor and 50% to J&J. In matters in which McCarter represents solely the Debtor or J&J, McCarter will allocate 100% of the fees and expenses to the entity represented.

McCarter will be compensated at its hourly rates, which are based on the professionals’ level of experience. At present, the hourly rates charged by McCarter fall within the following ranges:

<i>Billing Category</i>	<i>Range</i>
Partners	\$520-\$880
Counsel/Of Counsel	\$515-\$535
Associates	\$380-\$505
Paralegals/Other³	\$270-345

McCarter’s hourly rates may change from time to time in accordance with the terms of the Engagement Letter and McCarter’s established billing practices and procedures.

² Capitalized terms used herein but not otherwise defined have the meanings given to them in the Application.

³ “Other” includes Research Analysts.

With respect to the services performed pursuant to this Application, McCarter will maintain detailed, contemporaneous time records in six-minute intervals and apply to the Court for payment of compensation and reimbursement of expenses in accordance with applicable provisions of the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, the Local Rules of the United States Bankruptcy Court District of New Jersey, the *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under United States Code by Attorneys in Larger Chapter 11 Cases*, any Interim Compensation Order and any additional procedures that may be established by the Court in the Chapter 11 Case.

No promises have been received by McCarter, or any partner, counsel, or associate of McCarter, as to payment or compensation in connection with this Chapter 11 Case other than in accordance with the provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Bankruptcy Rules, and the Fee Guidelines. Furthermore, McCarter has no agreement with any other entity to share compensation received by McCarter or by such entity.

☐ Pursuant to D.N.J. LBR 2014-3, I request a waiver of the requirements of D.N.J. LBR 2016-1.

5. To the best of my knowledge, after reasonable and diligent investigation, my connection with the debtor(s), creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee, is as follows:

- ☐ None
- ☒ Describe connection: See no. 6 below.

6. To the best of my knowledge, after reasonable and diligent investigation, the connection of my firm, its members, shareholders, partners, associates, officers and/or employees with the debtor(s), creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee, is as follows:

- ☐ None
- ☒ Describe Connection:

To check and clear potential conflicts of interest in the Chapter 11 Case, as well as to determine all “connections” (as such term is used in Bankruptcy Rule 2014) to the Debtor, its affiliates, its creditors, other parties in interest, their respective attorneys, the U.S. Trustee or any person employed in the office of the U.S. Trustee, McCarter researched its client database to determine whether it had any relationships with the list of the names of individuals or institutions that are potential significant parties in interest (collectively, the “Interested Parties”) that was provided to McCarter by the Debtor. See Schedule 1 attached hereto. To the extent that McCarter’s research of its relationships with the Interested Parties indicates that McCarter has represented in the past two years, or currently represents, any of these entities in matters unrelated to the Chapter 11 Case,

the identities of these entities and such entities' relationship to the Debtor and connection to McCarter, are set forth in Schedule 2 hereto.

To the best of my knowledge and belief, insofar as I have been able to ascertain after reasonable inquiry, neither I, nor McCarter, nor any partner, associate or other professional thereof has any connection with the Debtor, its creditors, the U.S. Trustee or any other party with an actual or potential interest in the Chapter 11 Case or their respective attorneys or accountants, except as set forth below and in Schedule 2 hereto:

- a. McCarter has not represented, and does not and will not represent, any entity in matters adverse to the Debtor or its estate with respect to matters on which McCarter is to be employed.
- b. Prior to the Petition Date, McCarter represented Old JJCI, as insurance coverage counsel with respect to insurance coverage issues related to talc liabilities (the same role it has served for the Debtor after the 2021 Corporate Restructuring) and also as defense counsel in certain talc litigation.⁴
- c. Prior to the Petition Date, McCarter represented J&J as defense counsel in certain talc litigation.
- d. Prior to the Petition Date, McCarter represented two of the Debtor's non-debtor affiliates, J&J and Middlesex Assurance Company, as insurance coverage counsel, and continues to do so in the Talc Declaratory Judgment Action. McCarter, however, has not represented, and does not and will not represent, any of these entities in matters adverse to the Debtor or to the estate with respect to matters on which McCarter is to be employed.
- e. In matters unrelated to the Debtor or the Chapter 11 Case, McCarter currently represents Bank of America, N.A., which is the Debtor's Depository and Disbursement Bank. This relationship is set forth on the attached Schedule 2. McCarter, however, has not represented, and does not and will not represent, this entity in matters adverse to the Debtor or to the estate with respect to matters on which McCarter is to be employed.
- f. In matters unrelated to the Debtor or the Chapter 11 Case, McCarter currently represents certain parties who are Significant Co-Defendants in Talc-Related Litigation with the Debtor and affiliates thereof. These relationships are set forth on the attached Schedule 2. McCarter, however, has not represented, and does not and will not represent, any of these entities in matters adverse to the Debtor or to the estate with respect to matters on which McCarter is to be employed.
- g. In matters unrelated to the Debtor or the Chapter 11 Case, McCarter currently represents certain parties who are Material Potentially Indemnified Parties with

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As a result of the corporate restructuring that led to the formation of the Debtor, the Debtor was assigned McCarter's engagements with Old JJCI and became responsible for any liabilities thereunder.

respect to the Debtor and affiliates thereof. These relationships are set forth in the attached Schedule 2. McCarter, however, has not represented, and does not and will not represent, any of these entities in matters adverse to the Debtor or to the estate with respect to matters on which McCarter is to be employed.

- h. In matters unrelated to the Debtor or the Chapter 11 Case, McCarter currently represents certain parties who are Key Parties in Imerys Talc America, Inc. and Cyprus Mines Corp. Chapter 11 Cases and affiliates thereof. These relationships are set forth in the attached Schedule 2. McCarter, however, has not represented, and does not and will not represent, any of these entities in matters adverse to the Debtor or to the estate with respect to matters on which McCarter is to be employed.

With regards to compensation prior to the Petition Date, the Debtor paid McCarter for its services in connection with the 2021 Chapter 11 Case pursuant to the interim compensation order entered in that case throughout the pendency of the 2021 Chapter 11 Case. See also Disclosure of Compensation attached to the Application as Exhibit C.

On April 4, 2023, following the entry of the Dismissal Order and prior to the commencement of this Chapter 11 Case, McCarter received payment from the Debtor of all unpaid actual and estimated fees and expenses incurred through the commencement of this Chapter 11 Case. See Disclosure of Compensation attached to Application as Exhibit C.

In particular, following the entry of the Dismissal Order, on April 4, 2023, the Debtor paid McCarter \$597,494.29 via wire transfer (the “Payment”). This amount comprises (a) \$332,494.29 on account of actual and estimated fees and expenses for which the Debtor was responsible and that were incurred but not yet paid in the 2021 Chapter 11 Case through the entry of the Dismissal Order (the “Pre-Dismissal Amounts”),⁵ and (b) \$265,000.00 for McCarter’s estimated fees and expenses incurred following dismissal of the 2021 Chapter 11 Case and prior to the commencement of this Chapter 11 Case (the “Post-Dismissal Amounts”). The Payment was applied to the Pre-Dismissal Amounts and the Post-Dismissal Amounts prior to the commencement of this Chapter 11 Case.⁶ Accordingly, as of the Petition Date, McCarter was not owed any amounts by the Debtor.

⁵ Consistent with the Debtor’s indemnity obligations, this amount also included outstanding actual and estimated fees and expenses owed to McCarter by J&J for services provided in the NJ Mesothelioma Cases during the pendency of the 2021 Chapter 11 Case prior to the entry of the Dismissal Order. See Declaration of John K. Kim in Support of First Day Pleadings [Dkt. 4] ¶¶ 13-25 (providing that the Debtor is solely responsible for the talc-related liabilities of Old JJCI).

⁶ McCarter did not hold a retainer (a “Retainer”) as of the Petition Date. McCarter expects to: (a) complete its reconciliation of the fees and expenses actually incurred prior to the Petition Date no later than the filing of its first interim fee application in the Chapter 11 Case, and will separately reconcile the Payment made with respect to Pre-Dismissal Amounts and the Post-Dismissal Amounts; (b) make a corresponding adjustment to the amount of the Retainer on or about that date as described below; and (c) disclose such adjustment in its first interim fee application. If, following reconciliation, any estimated amounts included in either the Pre-Dismissal Amounts or the Post-Dismissal Amounts, respectively, exceeded McCarter’s unbilled actual fees and expenses incurred in the respective periods, the balance will be added to Retainer and applied by McCarter consistent with the terms of the Interim Compensation Order. McCarter will not

This payment to McCarter was made in accordance with the terms of the Dismissal Order, which provides that a Retained Professional (as defined therein) may “seek final allowance and payment of compensation and reimbursement of expenses” in accordance with the procedures set forth in the Dismissal Order, which procedures included serving “a statement of all of its unpaid fees and expenses incurred in [the 2021] Chapter 11 Case through the Dismissal Date” on the Debtor “no later than 45 days following the Dismissal Date.” Dismissal Order, ¶ 5. McCarter served such a statement on the Debtor.⁷

In addition, McCarter understands that the Debtor was solvent at the time it made this payment to McCarter. See LTL, 64 F.4th at 108 (“LTL, at the time of its filing, was highly solvent with access to cash to meet comfortably its liabilities as they came due for the foreseeable future.”); see also Apr. 18, 2023 Hr’g Tr. 62:21-25 (the Debtor’s chief legal officer testifying that Johnson & Johnson Holdco (NA) Inc. (“Holdco”), the party to the funding agreement with the Debtor, is valued at around \$30 billion); id. at 207:3-4 (counsel for the Debtor reiterating that the value of Holdco is \$30 billion).

7. To the best of my knowledge, my firm, its members, shareholders, partners, associates, officers and/or employees and I (check all that apply):

- ☐ do not hold an adverse interest to the estate.
- ☐ do not represent an adverse interest to the estate.
- ☐ are disinterested under 11 U.S.C. § 101(14).
- ☒ do not represent or hold any interest adverse to the debtor or the estate with respect to the matter for which I will be retained under 11 U.S.C. § 327(e).
- ☐ Other. Explain:

8. If the professional is an auctioneer,

- a. The following are my qualifications and experience with the liquidation or sale of similar property: N/A
- b. The proposed method of calculation of my compensation, including rates and formulas, is: N/A

Pursuant to D.N.J. 2014-2, I ☐ do or ☐ do not request a waiver of the requirements of D. N. J. LBR 2016-1.

- c. The following is an estimate of all costs and expenses, including labor, security, advertising delivery, mailing, and insurance, for which I will seek reimbursement from the sale proceeds: N/A.

apply any portion of the Retainer to fees and expenses incurred from and after the Petition Date unless and until authorized to do so by a further order of this Court, including an Interim Compensation Order. McCarter agrees to waive all actual fees and expenses, if any, owed by the Debtor that were unpaid by the Payment.

⁷ On April 26, 2023, the Debtor filed a motion for authorization to satisfy the fees and expenses of the other estate professionals involved in the 2021 Chapter 11 Case per the terms of the Dismissal Order. See Dkt. 319.

- d. Have you, or a principal of your firm, been convicted of a criminal offense?
☐ No ☐ Yes (explain below)
- e. I certify that a surety bond as described in D. N. J. LBR 2014-2(a)(6) is in effect and will remain so through the date of turnover of the auction proceeds.

9. If the professional is an auctioneer, appraiser, or realtor, the location and description of the property is as follows: N/A.

I certify under penalty of perjury that the above information is true.

Date: May 4, 2023

/s/ Thomas W. Ladd
Thomas W. Ladd (Bar No. 022631986)
McCARTER & ENGLISH LLP
Four Gateway Center
100 Mulberry Street
Newark, NJ 07102
Telephone: (973) 622-4444
Facsimile: (973) 624-7070

SCHEDULE 1

Schedule of Potentially Interested Parties

LTL Management LLC
Potentially Interested Parties

Debtor

LTL Management LLC

Direct Equity Owner of Debtor

Johnson & Johnson Holdco (NA) Inc.

Debtor's Direct Non-Debtor Subsidiary

Royalty A&M LLC

Other Non-Debtor Affiliates

3Dintegrated ApS
ABD Holding Company, Inc.
ABIOMED R&D, Inc.
ABIOMED, Inc.
Acclarent, Inc.
Actelion Ltd
Actelion Pharmaceuticals Ltd
Actelion Pharmaceuticals Trading
(Shanghai) Co., Ltd.
Actelion Pharmaceuticals US, Inc.
Actelion Treasury Unlimited Company
Albany Street LLC
ALZA Corporation
Alza Land Management, Inc.
AMO (Hangzhou) Co., Ltd.
AMO (Shanghai) Medical Devices
Trading Co., Ltd.
AMO ASIA LIMITED
AMO Australia Pty Limited
AMO Canada Company
AMO Denmark ApS
AMO Development, LLC
AMO France
AMO Germany GmbH
AMO Groningen B.V.
AMO International Holdings
Unlimited Company
AMO Ireland
AMO Italy SRL
AMO Japan K.K.
AMO Manufacturing USA, LLC
AMO Netherlands BV
AMO Nominee Holdings, LLC

AMO Norway AS
AMO Puerto Rico Manufacturing, Inc.
AMO Sales and Service, Inc.
AMO Singapore Pte. Ltd.
AMO Spain Holdings, LLC
AMO Switzerland GmbH
AMO United Kingdom, Ltd.
AMO Uppsala AB
Anakuria Therapeutics, Inc.
AorTx, Inc.
Apsis SAS
Aragon Pharmaceuticals, Inc.
Asia Pacific Holdings, LLC
Atrionix, Inc.
AUB Holdings LLC
Auris Health, Inc.
Backsvalan 6 Handelsbolag
Beijing Dabao Cosmetics Co., Ltd.
BeneVir BioPharm, Inc.
Berna Rhein B.V.
BioMedical Enterprises, Inc.
Biosense Webster (Israel) Ltd.
Biosense Webster, Inc.
Breathe, Inc.
C Consumer Products Denmark ApS, n/k/a
Coloplast Konsumerntvarer A/S
Carlo Erba OTC S.r.l.
Centocor Biologics, LLC
Centocor Research & Development, Inc.
Cerenovus, Inc.
ChromaGenics B.V.
Ci:z. Labo Co., Ltd.
Cilag AG
Cilag GmbH International
Cilag Holding AG
Cilag Holding Treasury Unlimited Company
Cilag-Biotech, S.L.
Coherex Medical, Inc.
ColBar LifeScience Ltd.
Consumer Test Entity
Cordis de Mexico, S.A. de C.V.
Corimmun GmbH
CoTherix Inc.

CRES Holdings, Inc.
CrossRoads Extremity Systems, LLC
CSATS, Inc.
Debs-Vogue Corporation
(Proprietary) Limited
DePuy Hellas SA
DePuy International Limited
DePuy Ireland Unlimited Company
DePuy Mexico, S.A. de C.V.
DePuy Mitek, LLC
DePuy Orthopaedics, Inc.
DePuy Products, Inc.
DePuy Spine, LLC
DePuy Synthes Institute, LLC
DePuy Synthes Products, Inc.
DePuy Synthes Sales, Inc.
DePuy Synthes, Inc.
Dutch Holding LLC
ECL7, LLC
EES Holdings de Mexico,
S. de R.L. de C.V.
EES, S.A. de C.V.
EIT Emerging Implant Technologies GmbH
Ethicon Endo-Surgery (Europe) GmbH
Ethicon Endo-Surgery, Inc.
Ethicon Endo-Surgery, LLC
Ethicon LLC
Ethicon Sarl
Ethicon US, LLC
Ethicon Women's Health & Urology Sarl
Ethicon, Inc.
Ethnor (Proprietary) Limited
Ethnor del Istmo S.A.
Ethnor Farmaceutica, S.A.
Finsbury (Development) Limited
Finsbury (Instruments) Limited
Finsbury Medical Limited
Finsbury Orthopaedics International Limited
Finsbury Orthopaedics Limited
FMS Future Medical System SA
GATT Technologies B.V.
GH Biotech Holdings Limited
Global Investment Participation B.V.
GMED Healthcare BV
Guangzhou Bioseal Biotech Co., Ltd.
Hansen Medical Deutschland GmbH

Hansen Medical International, Inc.
Hansen Medical UK Limited
Hansen Medical, Inc.
Healthcare Services (Shanghai) Ltd.
I.D. Acquisition Corp.
Innomedic Gesellschaft für innovative
Medizintechnik und Informatik mbH
J & J Company West Africa Limited
J&J Argentina S.A.
J&J Pension Trustees Limited
J&J Productos Medicos & Farmaceuticos
del Peru S.A.
J.C. General Services BV
Janssen Biologics (Ireland) Limited
Janssen Biologics B.V.
Janssen BioPharma, LLC
Janssen Biotech, Inc.
Janssen Cilag Farmaceutica S.A.
Janssen Cilag S.p.A.
Janssen Cilag SPA
Janssen Cilag, C.A.
Janssen Development Finance Unlimited
Company
Janssen Egypt LLC
Janssen Farmaceutica Portugal Lda
Janssen France Treasury Unlimited
Company
Janssen Global Services, LLC
Janssen Holding GmbH
Janssen Inc.
Janssen Irish Finance Unlimited Company
Janssen Japan Treasury Unlimited Company
Janssen Korea Ltd.
Janssen Mexico Treasury
Unlimited Company
Janssen Oncology, Inc.
Janssen Ortho LLC
Janssen Pharmaceutica
(Proprietary) Limited
Janssen Pharmaceutica NV
Janssen Pharmaceutica S.A.
Janssen Pharmaceutical K.K.
Janssen Pharmaceutical Sciences
Unlimited Company
Janssen Pharmaceutical Unlimited Company
Janssen Pharmaceuticals, Inc.

Janssen Products, LP
Janssen R&D Ireland Unlimited Company
Janssen Research & Development, LLC
Janssen Sciences Ireland
Unlimited Company
Janssen Scientific Affairs, LLC
Janssen Supply Group, LLC
Janssen Vaccines & Prevention B.V.
Janssen Vaccines Corp.
Janssen-Cilag
Janssen-Cilag (New Zealand) Limited
Janssen-Cilag A/S
Janssen-Cilag AG
Janssen-Cilag Aktiebolag
Janssen-Cilag AS
Janssen-Cilag B.V.
Janssen-Cilag d.o.o. Beograd
Janssen-Cilag de Mexico S. de R.L. de C.V.
Janssen-Cilag Farmaceutica Lda.
Janssen-Cilag Farmaceutica Ltda.
Janssen-Cilag GmbH
Janssen-Cilag International NV
Janssen-Cilag Kft.
Janssen-Cilag Limited
Janssen-Cilag Manufacturing, LLC
Janssen-Cilag NV
Janssen-Cilag OY
Janssen-Cilag Pharma GmbH
Janssen-Cilag Pharmaceutical S.A.C.I.
Janssen-Cilag Polska, Sp. z o.o.
Janssen-Cilag Pty Ltd
Janssen-Cilag S.A.
Janssen-Cilag s.r.o.
Janssen-Cilag, S.A.
Janssen-Cilag, S.A. de C.V.
Janssen-Pharma, S.L.
J-C Health Care Ltd.
Jevco Holding, Inc.
JJ Surgical Vision Spain, S.L.
JJC Acquisition Company B.V.
JJHC, LLC
JJSV Belgium BV
JJSV Manufacturing Malaysia SDN. BHD.
JJSV Norden AB
JJSV Produtos Otricos Ltda.
JNJ Global Business Services s.r.o.

JNJ Holding EMEA B.V.
JNJ International Investment LLC
JNTL (APAC) HoldCo 2 LLC
JNTL (APAC) HoldCo 3 Pte. Ltd.
JNTL (APAC) HoldCo LLC
JNTL (APAC) HoldCo Pte. Ltd.
JNTL (Japan) HoldCo Inc.
JNTL (Malaysia) Sdn. Bhd.
JNTL (Middle East) HoldCo LLC
JNTL (Puerto Rico) HoldCo GmbH
JNTL (Shanghai) Investment Co., Ltd.
JNTL (Switzerland) HoldCo GmbH
JNTL (Thailand) HoldCo LLC
JNTL (UK) HoldCo Limited
JNTL Consumer Health (Belgium) BV
JNTL Consumer Health (Brazil) Ltda.
JNTL Consumer Health
(Czech Republic) s.r.o.
JNTL Consumer Health
(Dominican Republic), S.A.S.
JNTL Consumer Health (Finland) Oy
JNTL Consumer Health (France) SAS
JNTL Consumer Health (Hungary) Kft
JNTL Consumer Health (India)
Private Limited
JNTL Consumer Health
(New Zealand) Limited
JNTL Consumer Health (Norway) AS
JNTL Consumer Health (Philippines) Inc.
JNTL Consumer Health (Poland) sp. z o.o.
JNTL Consumer Health (Portugal) Limitada
JNTL Consumer Health (Services) LLC
JNTL Consumer Health (Slovakia), s.r.o.
JNTL Consumer Health (Spain), S.L.
JNTL Consumer Health (Taiwan) Limited
JNTL Consumer Health (Vietnam) Co. Ltd.
JNTL Consumer Health General
Services BV
JNTL Consumer Health I (Ireland) Limited
JNTL Consumer Health I
(Switzerland) GmbH
JNTL Consumer Health II
(Switzerland) GmbH
JNTL Consumer Health LLC
JNTL Consumer Health Mexico,
S. de R.L. de C.V.

JNTL Consumer Health Middle
East FZ-LLC

JNTL HoldCo 2 LLC

JNTL HoldCo 3 LLC

JNTL HoldCo 4 LLC

JNTL HoldCo 5 LLC

JNTL HoldCo 6 LLC

JNTL HoldCo 7 LLC

JNTL HoldCo 8 LLC

JNTL HoldCo LLC

JNTL Holdings 2, Inc.

JNTL Holdings 3, Inc.

JNTL Holdings B.V.

JNTL Holdings, Inc.

JNTL Ireland HoldCo 2 B.V.

JNTL Netherlands HoldCo B.V.

JNTL Turkey Tüketici Sağlığı

Limited Şirketi

Johnson & Johnson

Johnson & Johnson - Societa' Per Azioni

Johnson & Johnson (Angola), Limitada

Johnson & Johnson (Australia) Pty Ltd

Johnson & Johnson (Canada) Inc.

Johnson & Johnson (China) Investment Ltd.

Johnson & Johnson (Ecuador) S.A.

Johnson & Johnson (Egypt) S.A.E.

Johnson & Johnson (Hong Kong) Limited

Johnson & Johnson (Ireland) Limited

Johnson & Johnson (Jamaica) Limited

Johnson & Johnson (Kenya) Limited

Johnson & Johnson (Middle East) Inc.

Johnson & Johnson (Mozambique),

Limitada

Johnson & Johnson (Namibia)

(Proprietary) Limited

Johnson & Johnson (New Zealand) Limited

Johnson & Johnson (Philippines), Inc.

Johnson & Johnson (Private) Limited

Johnson & Johnson (Singapore)

Holdco LLC

Johnson & Johnson (Thailand) Ltd.

Johnson & Johnson (Trinidad) Limited

Johnson & Johnson (Vietnam) Co., Ltd

Johnson & Johnson AB

Johnson & Johnson AG

Johnson & Johnson Bulgaria EOOD

Johnson & Johnson China Ltd.

Johnson & Johnson Consumer

(Hong Kong) Limited

Johnson & Johnson Consumer

(Thailand) Limited

Johnson & Johnson Consumer B.V.

Johnson & Johnson Consumer

Holdings France

Johnson & Johnson Consumer Inc.

Johnson & Johnson Consumer NV

Johnson & Johnson Consumer

Saudi Arabia Limited

Johnson & Johnson Consumer Services

EAME Ltd.

Johnson & Johnson d.o.o.

Johnson & Johnson de Argentina S.A.C. e. I.

Johnson & Johnson de Chile S.A.

Johnson & Johnson de Colombia S.A.

Johnson & Johnson de Mexico, S.A. de C.V.

Johnson & Johnson de Uruguay S.A.

Johnson & Johnson de Venezuela, S.A.

Johnson & Johnson del Ecuador, S.A.

Johnson & Johnson Del Paraguay, S.A.

Johnson & Johnson del Peru S.A.

Johnson & Johnson do Brasil Industria E

Comercio de Produtos Para Saude Ltda.

Johnson & Johnson Dominicana, S.A.S.

Johnson & Johnson Enterprise

Innovation Inc.

Johnson & Johnson European Treasury

Unlimited Company

Johnson & Johnson Finance Corporation

Johnson & Johnson Finance Limited

Johnson & Johnson Financial

Services GmbH

Johnson & Johnson for Export and

Import LLC

Johnson & Johnson Gateway, LLC

Johnson & Johnson Gesellschaft m.b.H.

Johnson & Johnson GmbH

Johnson & Johnson GT, Sociedad Anónima

Johnson & Johnson Guatemala, S.A.

Johnson & Johnson Health and Wellness

Solutions, Inc.

Johnson & Johnson Health Care

Systems Inc.

Johnson & Johnson Hellas Commercial and
Industrial S.A.
Johnson & Johnson Hellas
Consumer Products
Commercial Societe Anonyme
Johnson & Johnson Hemisferica S.A.
Johnson & Johnson Holdco (NA) Inc.
Johnson & Johnson Holding GmbH
Johnson & Johnson Holdings
(Austria) GmbH
Johnson & Johnson Inc.
Johnson & Johnson Industrial Ltda.
Johnson & Johnson Innovation - JJDC, Inc.
Johnson & Johnson Innovation Limited
Johnson & Johnson Innovation LLC
Johnson & Johnson International
Johnson & Johnson International
(Singapore) Pte. Ltd.
Johnson & Johnson International Financial
Services Unlimited Company
Johnson & Johnson Irish Finance
Company Limited
Johnson & Johnson K.K.
Johnson & Johnson Kft.
Johnson & Johnson Korea Selling &
Distribution LLC
Johnson & Johnson Korea, Ltd.
Johnson & Johnson Limited
Johnson & Johnson LLC
Johnson & Johnson Luxembourg Finance
Company Sarl
Johnson & Johnson Management Limited
Johnson & Johnson Medical (China) Ltd.
Johnson & Johnson Medical
(Proprietary) Ltd
Johnson & Johnson Medical (Shanghai) Ltd.
Johnson & Johnson Medical (Suzhou) Ltd.
Johnson & Johnson Medical B.V.
Johnson & Johnson Medical Devices &
Diagnostics Group - Latin America,
L.L.C.
Johnson & Johnson Medical GmbH
Johnson & Johnson Medical Greece
Single Member S.A.
Johnson & Johnson Medical Korea Ltd.
Johnson & Johnson Medical Limited

Johnson & Johnson Medical Mexico,
S.A. de C.V.
Johnson & Johnson Medical NV
Johnson & Johnson Medical
Products GmbH
Johnson & Johnson Medical Pty Ltd
Johnson & Johnson Medical S.A.
Johnson & Johnson Medical S.p.A.
Johnson & Johnson Medical SAS
Johnson & Johnson Medical
Saudi Arabia Limited
Johnson & Johnson Medical Taiwan Ltd.
Johnson & Johnson Medical, S.C.S.
Johnson & Johnson Medikal Sanayi ve
Ticaret Limited Sirketi
Johnson & Johnson MedTech
(Thailand) Ltd.
Johnson & Johnson Medtech
Colombia S.A.S.
Johnson & Johnson Middle East FZ-LLC
Johnson & Johnson Morocco
Societe Anonyme
Johnson & Johnson Nordic AB
Johnson & Johnson Pacific Pty Limited
Johnson & Johnson Pakistan
(Private) Limited
Johnson & Johnson Panama, S.A.
Johnson & Johnson Personal Care
(Chile) S.A.
Johnson & Johnson Pharmaceutical Ltd.
Johnson & Johnson Poland Sp. z o.o.
Johnson & Johnson Private Limited
Johnson & Johnson Pte. Ltd.
Johnson & Johnson Pty. Limited
Johnson & Johnson Romania S.R.L.
Johnson & Johnson S.E. d.o.o.
Johnson & Johnson S.E., Inc.
Johnson & Johnson Sante Beaute France
Johnson & Johnson SDN. BHD.
Johnson & Johnson Services, Inc.
Johnson & Johnson Surgical Vision India
Private Limited
Johnson & Johnson Surgical Vision, Inc.
Johnson & Johnson Taiwan Ltd.
Johnson & Johnson UK Treasury
Company Limited

Johnson & Johnson Ukraine LLC
Johnson & Johnson Urban
Renewal Associates
Johnson & Johnson Vision Care
(Australia) Pty Ltd
Johnson & Johnson Vision Care
(Shanghai) Ltd.
Johnson & Johnson Vision Care Ireland
Unlimited Company
Johnson & Johnson Vision Care, Inc.
Johnson & Johnson Vision Korea, Ltd.
Johnson & Johnson, Lda
Johnson & Johnson, S.A.
Johnson & Johnson, S.A. de C.V.
Johnson & Johnson, s.r.o.
Johnson & Johnson, s.r.o.
Johnson and Johnson (Proprietary) Limited
Johnson and Johnson Sihhi Malzeme Sanayi
Ve Ticaret Limited Sirketi
Johnson Y Johnson de Costa Rica, S.A.
JOM Pharmaceutical Services, Inc.
Kenvue Inc.
La Concha Land Investment Corporation
McNeil AB
McNeil Consumer Pharmaceuticals Co.
McNeil Denmark ApS
McNeil Healthcare (Ireland) Limited
McNeil Healthcare (UK) Limited
McNeil Healthcare LLC
McNeil Iberica S.L.U.
McNeil LA LLC
McNEIL MMP, LLC
McNeil Nutritionals, LLC
McNeil Panama, LLC
McNeil Products Limited
McNeil Sweden AB
Medical Device Business Services, Inc.
Medical Devices & Diagnostics
Global Services, LLC
Medical Devices International LLC
Medos International Sarl
Medos Sarl
MegaDyne Medical Products, Inc.
Menlo Care De Mexico, S.A. de C.V.
Mentor B.V.
Mentor Deutschland GmbH

Mentor Medical Systems B.V.
Mentor Partnership Holding
Company I, LLC
Mentor Texas GP LLC
Mentor Texas L.P.
Mentor Worldwide LLC
Middlesex Assurance Company Limited
Momenta Ireland Limited
Momenta Pharmaceuticals, Inc.
NeoStrata Company, Inc.
NeoStrata UG (haftungsbeschränkt)
Netherlands Holding Company
Neuravi Limited
NeuWave Medical, Inc.
Novira Therapeutics, LLC
NuVera Medical, Inc.
Obtech Medical Mexico, S.A. de C.V.
OBTECH Medical Sarl
OGX Beauty Limited
OMJ Holding GmbH
OMJ Pharmaceuticals, Inc.
Omrix Biopharmaceuticals Ltd.
Omrix Biopharmaceuticals NV
Omrix Biopharmaceuticals, Inc.
Ortho Biologics LLC
Ortho Biotech Holding LLC
Orthospin Ltd.
Orthotaxy SAS
Patriot Pharmaceuticals, LLC
Peninsula Pharmaceuticals, LLC
Percivia LLC
Pharmadirect Ltd.
Pharmedica Laboratories
(Proprietary) Limited
preCARDIA, Inc.
Princeton Laboratories, Inc.
Productos de Cuidado Personal y
de La Salud de Bolivia S.R.L.
Proleader S.A.
Prosidian, Inc.
PT Integrated Healthcare Indonesia
PT Johnson & Johnson Indonesia
PT Johnson and Johnson Indonesia Two
Pulsar Vascular, Inc.
Regency Urban Renewal Associates
RespiVert Ltd.

Review Manager Test Entity 2
Royalty A&M LLC
Rutan Realty LLC
Scios LLC
Serhum S.A. de C.V.
Shanghai Elsker Mother & Baby Co., Ltd
Shanghai Johnson & Johnson Ltd.
Shanghai Johnson & Johnson
Pharmaceuticals Ltd.
Sodiac ESV
Spectrum Vision Limited Liability Company
Spectrum Vision Limited Liability
Partnership
SterilMed, Inc.
Surgical Process Institute
Deutschland GmbH
Synthes Costa Rica S.C.R., Limitada
SYNTHES GmbH
Synthes GmbH
Synthes Holding AG
Synthes Holding Limited
SYNTHES Medical Immobilien GmbH
Synthes Medical Surgical Equipment &
Instruments Trading LLC
Synthes Produktions GmbH
Synthes Proprietary Limited
Synthes S.M.P., S. de R.L. de C.V.
Synthes Tuttlingen GmbH
Synthes USA Products, LLC
Synthes USA, LLC
Synthes, Inc.
TARIS Biomedical LLC
TearScience, Inc.
The Anspach Effort, LLC
The Vision Care Institute, LLC
Tibotec, LLC
Torax Medical, Inc.
UAB "Johnson & Johnson"
Vania Expansion
Verb Surgical Inc.
Vision Care Finance Unlimited Company
Vogue International LLC
WH4110 Development Company, L.L.C.
Xian Janssen Pharmaceutical Ltd.
XO1 Limited
Zarbee's, Inc.

Managers and Officers of the Debtor

John Kim
Richard Dickinson
Robert Wuesthoff
Russell Deyo

Major Current Business Affiliations of Debtor's Managers

American Foundation for Opioid
Alternatives
Migration Policy Institute
Miller Center for Community Protection &
Reliance, Eagleton Institute of Politics,
Rutgers University
National Center for State Courts
National Council, McLean Hospital
One Mind

Depository and Disbursement Banks

Bank of America, N.A.

Major Sureties

Chubb
Federal Insurance Company
Liberty Mutual Insurance Company
Travelers Casualty and Surety Company
of America

Parties to Material Contracts With the Debtor

Johnson & Johnson
Johnson & Johnson Holdco (NA) Inc.
Johnson & Johnson Services, Inc.

Significant Co-Defendants in Talc-Related Litigation

3M Company
A.O. Smith Corporation
Albertsons Companies, Inc.
Avon Products, Inc.
Barretts Minerals, Inc.
BASF Catalysts LLC
Block Drug Company, Inc.
Borg Warner Morse Tec, Inc.
Brenntag North America
Brenntag Specialties, Inc.

Bristol-Myers Squibb Company
Carrier Corporation
Chanel, Inc.
Charles B. Chrystal Co., Inc.
Chattem, Inc.
Colgate-Palmolive Company
Conopco Inc.
Costco Wholesale Corporation
Coty, Inc.
Crane Co.
CVS Health Corporation
CVS Pharmacy, Inc.
Cyprus Amax Minerals Company
Cyprus Mines Corporation
Dana Companies, LLC
DAP Products, Inc.
Dollar General Corporation
Duane Reade Inc.
Eaton Corporation
Eli Lilly and Company
Elizabeth Arden, Inc.
Estee Lauder Inc.
Family Dollar Stores Inc.
Flowserve US, Inc.
FMC Corporation
Food 4 Less of California, Inc.
Ford Motor Company
Foster Wheeler, LLC
Gardner Denver, Inc.
General Electric Company
Genuine Parts Company
Goodyear Tire & Rubber Co.
Goulds Pumps, LLC
Grinnell LLC
Honeywell International, Inc.
Imerys Talc America, Inc.
Imerys USA, Inc.
IMO Industries Inc.
John Crane, Inc.
K&B Louisiana Corporation
Kaiser Gypsum Company, Inc.
Kmart Corporation
Kolmar Laboratories
Longs Drug Stores California
L'Oreal USA, Inc.
Lucky Stores, Inc.

Macy's, Inc.
Mary Kay Inc.
Maybelline LLC
Metropolitan Life Insurance Company
Noxell Corporation
Personal Care Products Council
Pfizer, Inc.
Pharma Tech Industries, Inc.
Pneumo Abex, LLC
PTI Royston, LLC
Publix Super Markets, Inc.
R.T. Vanderbilt Holding Company, Inc.
Ralphs Grocery Company
Revlon Consumer Products Corporation
Revlon, Inc.
Rite Aid Corporation
Safeway, Inc.
Sanofi-Aventis U.S. LLC
Shulton, Inc.
Specialty Minerals Inc.
Target Corporation
The Dow Chemical Company
The Estee Lauder Companies, Inc.
The Kroger Co.
The Procter & Gamble Company
Thrifty Payless, Inc.
Unilever Home & Personal Care USA
Union Carbide Corporation
Vanderbilt Minerals, LLC
ViacomCBS, Inc.
Walgreen Co.
Walmart, Inc.
Warren Pumps, LLC
Whittaker Clark & Daniels, Inc.
Wyeth Holdings LLC
Yves Saint Laurent America, Inc.

**Debtor's Proposed Professionals and
Claims Agent**

AlixPartners LLP
Bates White LLC
Blake, Cassels & Graydon LLP
Epiq Corporate Restructuring LLC
Hogan Lovells
Jones Day
King & Spalding LLP

McCarter & English, LLP
Orrick, Herrington, & Sutcliffe, LLP
Shook, Hardy & Bacon L.L.P.
Skadden, Arps, Slate, Meager & Flom LLP
Weil Gotshal & Manges LLP
Wollmuth Maher & Deutsch LLP

**Debtor's Proposed Significant Ordinary
Course Professionals, Consultants and
Service Providers**

Adler Pollock & Sheehan PC
Barrasso Usdin Kupperman
Freeman & Sarver, L.L.C.
Blank Rome LLP
Butler Snow LLP
Carlton Fields, P.A.
Chehardy, Sherman, Williams,
Recile, & Hayes
Damon Key Leong Kupchak Hastert
Davis Hatley Haffeman & Tighe
Dechert LLP
Elliott Law Offices, PA
Faegre Drinker Biddle & Reath LLP
Foliart, Huff, Ottaway & Bottom
Gibson, Dunn & Crutcher LLP
Goldman Ismail Tomaselli Brennan &
Baum
Hartline Barger
HeplerBroom LLC
Irwin Fritchie Urquhart & Moore LLC
Johnson & Bell Ltd.
Jones, Skelton & Hochuli, P.L.C.
Kaplan, Johnson, Abate & Bird LLP
Kelley Jasons McGowan Spinelli
Hanna & Reber, LLP
Kirkland & Ellis LLP
Kitch Drutchas Wagner
Valitutti & Sherbrook
Lewis Brisbois Bisgaard & Smith, LLP
Manion Gaynor & Manning LLP
Manning Gross + Massenburg
Miles & Stockbridge
Milligan & Herns
Morgan Lewis
Nelson Mullins Riley & Scarborough, LLP
Nutter McClennen & Fish LLP

Patterson Belknap Webb & Tyler LLP
Proskauer Rose LLP
Quattlebaum, Grooms & Tull PLLC
Schnader Harrison Segal & Lewis
Schwabe Williamson & Wyatt
Sills Cummis & Gross P.C.
Stoel Rives LLP
Sullivan Whitehead & Deluca LLP
Swartz Campbell LLC
The Weinhardt Law Firm
Tucker Ellis LLP
Willcox & Savage, P.C.

**Known Professionals for Certain
Non-Debtor Parties in Interest**

Barnes & Thornburg, LLP
Cravath, Swaine & Moore
White & Case LLP

**Proposed Future Claimants'
Representative and Her Proposed
Professional**

Randi S. Ellis
Walsh Pizzi O'Reilly Falanga LLP

Material Potentially Indemnified Parties

Bausch Health Companies Inc.
Cyprus Mines Corporation
Cyprus Talc Corp.
Imerys Talc America, Inc.
Imerys Talc Vermont, Inc.
Luzenac America, Inc.
Pharma Tech Industries, Inc.
PTI Royston, LLC
Rio Tinto America, Inc.
RTZ America, Inc.
Valeant Pharmaceuticals International, Inc.
Windsor Minerals Inc.
Costco Wholesale Corporation
Publix Super Markets, Inc.
Rite Aid Corporation
Safeway Inc.
Walmart Inc.

**Parties Who Have Entered Into Plan
Support Agreements**

Andres Pereira Firm
Ferrer, Poirot & Wansbrough
Johnson Law Group
Liakos Law, APC
Linville Law Group
McDonald Worley
Nachawati Law Group
OnderLaw, LLC
Pulaski Kherkher PLLC
Rueb Stoller Daniel, LLP
Seeger Weiss LLP
Slater Slater Schulman LLP
Trammell PC
Watts Guerra LLP
Wisner Baum, LLP

**Law Firms with Significant
Representations of Talc Claimants**

Andres Pereira Firm
Arnold & Itkin LLP
Aylstock, Witkin, Kreis &
Overholtz, PLLC
Beasley Allen Law Firm
Childers, Schlueter & Smith LLC
Ferrer, Poirot & Wansbrough
Johnson Law Group
Linville Law Group
McDonald Worley
Miller Firm, LLC
Nachawati Law Group
Napoli Shkolnik PLLC
OnderLaw, LLC
Pulaski Kherkher PLLC
Robinson Calcagnie
Rueb Stoller Daniel, LLP
Sanders, Phillips, Grossman, LLC
Seeger Weiss LLP
Slater Slater Schulman LLP
Trammell PC
Wagstaff Law Firm
Watts Guerra LLP
Wisner Baum, LLP

**Key Parties in *Imerys Talc America, Inc.*
and *Cyprus Mines Corp.* Chapter 11 Cases**

Cyprus Amax Minerals Company
Cyprus Mines Corporation
Cyprus Talc Corporation
Imerys S.A.
Imerys Talc America, Inc.
Imerys Talc Vermont, Inc.
(fka Windsor Minerals Inc.)
James L. Patton
Luzenac America, Inc.
Official Committee of Tort Claimants
(*In re Imerys Talc America, Inc.*)
Official Committee of Tort Claimants
(*In re Cyprus Mines Corp.*)
Roger Frankel

Debtor's Insurers

A.G. Securitas
ACE Property & Casualty Insurance
Company
Aetna Casualty and Surety Company
Affiliated FM Ins. Company
AIG Europe S.A.
AIG Property and Casualty Company
AIU Ins. Company
Allianz Global Risks US
Insurance Company
Allianz Ins. Company
Allstate Insurance Company
American Centennial Ins. Company
American Motorists Ins. Company
American Re-Insurance Company
Arrowood Indemnity Company
ASR Schadeverzekering N.V.
Assurances Generales De France
Assurantiekantoor VanWijk & Co.
Atlanta International Insurance Company,
n/k/a Wellfleet New York Insurance
Company
Birmingham Fire Ins. Company of
Pennsylvania
Central National Ins. Company of Omaha
Century Indemnity Company
Champion Dyeing Allocation Year
Chubb

City Ins. Company
Colonia Versicherungs AG, Koln
Company of N.Y.
Continental Insurance Company
Darag Deutsche Versicherungs-Und
Drake Ins. Company of New York
Employers Ins. Company of Wausau
Employers Ins. of Wausau
Employers Mutual Casualty Company
Eurinco Allgemeine
Everest Reinsurance Company
Fireman's Fund Ins. Company
First State Ins. Company
GAP
Gibraltar Casualty Company
Granite State Ins. Company
Great American
Great Northern Ins. Company
Great Southwest Fire Ins. Company
Groupe Drouot
Harbor Ins. Company
Hartford Accident and Indemnity Company
Home Ins. Company
Ideal Mutual Ins. Company
Industrial Indemnity Company
Ins. Company of North America
Ins. Company of the State of Pennsylvania
Ins. Corporation of Singapore Limited
Integrity Ins. Company
International Ins. Company
International Surplus Lines Ins. Company
Lexington Ins. Company
London Guarantee and Accident
L'Union Atlantique S.A. d'Assurances
Maas Lloyd
Mead Reinsurance Corporation
Middlesex Assurance Company
Midland Ins. Company
Midstates Reinsurance Corp.
Mission Ins. Company
Mission National Ins. Company
Munich Reinsurance America, Inc.
Mutual Fire, Marine, & Inland Ins.
Company
N.V. De Ark
N.V. Rotterdamse Assurantiekas

N.V. Schadeverzekeringsmaatschappij
National Casualty Company
National Union Fire Ins. Company of
Pittsburgh, PA
Nationwide
New Hampshire Ins. Company
North River Ins. Company
Northbrook Excess and Surplus
Ins. Company
Northeastern Fire Ins. Company
of Pennsylvania
Pacific Employers Ins. Company
ProSight
Prudential Reinsurance Company
Puritan Insurance Company
Republic Indemnity Company of America
Republic Ins. Company
Republic Western Ins. Company
Repwest Insurance Company
Resolute Management Inc.
Rheinland Versicherungen
Rheinland Verzekeringen
Riverstone Insurers
Royal Belge I.R., S.A. d'Assurances
Royal Indemnity Company
Royal Ins. Company
Rückversicherungs-AG
Safety Mutual Casualty Corporation
Safety National Casualty Corporation
Seguros La Republica SA
Sentry Insurance A Mutual Company
Southern American Ins. Company
Starr Indemnity & Liability Company
TIG Insurance Company
Transamerica Premier Insurance Company
Transit Casualty Company
Travelers Casualty and Surety Company
UAP
Union Atlantique d'Assurances S.A.
Union Indemnity Ins. Company
of New York
Versicherungs AG, Dusseldorf
Westchester Fire Insurance Company
Westport Insurance Corporation
XL Ins. Company

Potential Parties in Canadian Proceeding

Cassels Brock & Blackwell LLP
Ernst & Young Inc.

Washington, D.C.
West Virginia
Wisconsin

**States/Federal District With Consumer
Protection Investigations/Actions**

Alabama
Alaska
Arkansas
Arizona
Colorado
Connecticut
Delaware
Florida
Georgia
Hawaii
Idaho
Illinois
Iowa
Kansas
Kentucky
Maine
Maryland
Massachusetts
Michigan
Minnesota
Mississippi
Montana
Nebraska
Nevada
New Hampshire
New Jersey
New Mexico
New York
North Carolina
North Dakota
Ohio
Oklahoma
Oregon
Rhode Island
South Dakota
Texas
Utah
Vermont
Virginia
Washington

**The Office of the United States Trustee –
Region 3 – District of New Jersey**

Adam Shaarawy
Adela Alfaro
Alexandria Nikolinos
Angeliza Ortiz-Ng
Daniel C. Kropiewnicki
David Gerardi
Fran B. Steele
Francyne D. Arendas
James Stives
Jeffrey Sponder
Joseph C. Kern
Kirsten K. Ardelean
Lauren Bielskie
Maggie McGee
Martha Hildebrandt
Michael Artis
Neidy Fuentes
Peter J. D'Auria
Robert J. Schneider, Jr.
Tia Green
Tina L. Oppelt
William J. Ziemer

**Bankruptcy Judges for the District
of New Jersey**

Judge Andrew B. Altenburg, Jr.
Judge Christine M. Gravelle
Judge Jerrold N. Poslusny, Jr.
Judge John K. Sherwood
Judge Kathryn C. Ferguson
Judge Michael B. Kaplan
Judge Rosemary Gambardella
Judge Stacey L. Meisel
Judge Vincent F. Papalia

SCHEDULE 2

Disclosure Schedule

SCHEDULE 2

Disclosure Schedule

<i>Relationship to Debtor</i>	<i>Name of Entity</i>	<i>Relationship to McCarter & English, LLP</i>
<i>Other Non-Debtor Affiliates</i>	Johnson & Johnson	McCarter & English currently represents Johnson & Johnson with respect to insurance coverage and products liability issues related to talc liabilities
	Middlesex Assurance Company Limited	McCarter & English currently represents Middlesex Assurance Company Limited with respect to insurance coverage issues related to talc liabilities
<i>Depository and Disbursement Banks</i>	Bank of America, N.A.	McCarter & English currently represents Bank of America, N.A. in matters unrelated to the Debtor
<i>Significant Co-Defendants in Talc-Related Litigation</i>	3M Company	McCarter & English represented 3M Company in matters unrelated to the Debtor and this work has now concluded.
	BASF Catalysts LLC	McCarter & English currently represents BASF Catalysts LLC in matters unrelated to the Debtor
	Brenntag North America	McCarter & English currently represents Brenntag North America in matters unrelated to the Debtor
	Bristol-Myers Squibb Company	McCarter & English currently represents Bristol-Myers Squibb Company in matters unrelated to the Debtor
	Colgate-Palmolive Company	McCarter & English currently represents Colgate-Palmolive Company in matters unrelated to the Debtor
	Eaton Corporation	McCarter & English currently represents Eaton Corporation and certain of its affiliates in matters unrelated to the Debtor

<i>Relationship to Debtor</i>	<i>Name of Entity</i>	<i>Relationship to McCarter & English, LLP</i>
	FMC Corporation	McCarter & English currently represents FMC Corporation in matters unrelated to the Debtor
	General Electric Company	McCarter & English currently represents General Electric Company in matters unrelated to the Debtor
	Goodyear Tire & Rubber Co.	McCarter & English currently represents Goodyear Tire & Rubber Company in matters unrelated to the Debtor
	L'Oreal USA, Inc.	McCarter & English currently represents L'Oreal USA, Inc. in matters unrelated to the Debtor
	Metropolitan Life Insurance Company	McCarter & English currently represents Metropolitan Life Insurance Company and certain of its affiliates in matters unrelated to the Debtor
	Pfizer, Inc.	McCarter & English currently represents Pfizer, Inc. and certain of its affiliates in matters unrelated to the Debtor
	Sanofi-Aventis U.S. LLC	McCarter & English currently represents Sanofi-Aventis U.S. LLC in matters unrelated to the Debtor
	The Estee Lauder Companies, Inc.	McCarter & English currently represents The Estee Lauder Companies, Inc. in matters unrelated to the Debtor
	The Proctor & Gamble Company	McCarter & English currently represents The Proctor & Gamble Company and certain of its affiliates in matters unrelated to the Debtor

<i>Relationship to Debtor</i>	<i>Name of Entity</i>	<i>Relationship to McCarter & English, LLP</i>
	Unilever Home & Personal Care USA	McCarter & English currently represents Unilever Home & Personal Care USA and certain of its affiliate in matters unrelated to the Debtor
	Walgreen Co.	McCarter & English currently represents Walgreen Co. in matters unrelated to the Debtor
	Walmart, Inc.	McCarter & English currently represents Walmart, Inc. in matters unrelated to the Debtor
	Whitaker Clark & Daniels Inc.	McCarter & English currently represents Whitaker Clark & Daniels Inc. in matters unrelated to the Debtor
	Wyeth Holdings LLC	McCarter & English currently represents Wyeth Holdings LLC in matters unrelated to the Debtor
<i>Material Potentially Indemnified Parties</i>	Bausch Health Companies Inc.	McCarter & English currently represents Bausch Health Companies Inc. in matters unrelated to the Debtor
	Valeant Pharmaceuticals International, Inc.	McCarter & English currently represents Valeant Pharmaceuticals International, Inc. in matters unrelated to the Debtor
<i>Key Parties in Imerys Talc America, Inc. and Cyprus Mines Corp. Chapter 11 Cases</i>	Cyprus Amax Minerals Company	McCarter & English currently represents Cyprus Amax Minerals Company and certain of its affiliates in matters unrelated to the Debtor
	Cyprus Mines Corporation	McCarter & English currently represents Cyprus Mines Corporation and certain of its affiliates in matters unrelated to the Debtor